

Message

From: Bohan, Suzanne [bohan.suzanne@epa.gov]
Sent: 12/14/2018 3:35:47 PM
To: Benevento, Douglas [benevento.douglas@epa.gov]; Thomas, Deb [thomas.debrah@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]
CC: Darling, Corbin [Darling.Corbin@epa.gov]; Opekar, Kimberly [Opekar.Kimberly@epa.gov]
Subject: ECEJ's New Guidelines for Implementing EJ in Enforcement Activities
Attachments: Guidelines for Implementing EJ in Enforcement Activities.FINAL.12132018.ba.docx

Doug, Deb and Megan –

You may recall reviewing my earlier draft of these guidelines. Megan and I met a few months ago to discuss the previous draft. I expect that implementation of these guidelines will help us better ensure appropriate consideration of vulnerable populations and overburdened communities in our inspection targeting, compliance assurance and enforcement activities.

Suzanne

From: Bohan, Suzanne
Sent: Friday, December 14, 2018 8:15 AM
To: R8 All ECEJ <R8_All_ECEJ@epa.gov>
Subject: New Guidelines for Implementing EJ in Enforcement Activities

ECEJ Colleagues:

Please find attached ECEJ's *Guidelines for Implementing Environmental Justice in Enforcement Activities* (Guidelines) which describe expectations for considering environmental justice (EJ) while conducting our compliance and enforcement work. These Guidelines set forth procedures for Region 8's civil enforcement staff and managers to integrate the consideration of environmental justice (EJ) into enforcement and compliance assurance activities. They are in support of Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* and are consistent with the Agency's EJ priorities and focus on vulnerable populations. These Guidelines will serve as a handy reference for considering EJ during each stage of the compliance monitoring and enforcement process including:

- **Pre-Enforcement Activities** including planning and prioritizing inspections or Regional enforcement initiatives, conducting inspections, responding to citizen complaints, and National Compliance Initiative (NCI) planning (see pages 1-2)
- **Enforcement case screening and identifying potential EJ concerns for enforcement cases** (see pages 2-3)
- **Case development and developing an appropriate EJ enforcement strategy** (see pages 3-6)
- **Case conclusion and documentation of EJ considerations** (see pages 6-7)

I want to thank both past and present members of ECEJ's EJ in Enforcement team who compiled these Guidelines. Should you have questions about these Guidelines, please contact any of the current members of the EJ in Enforcement team (Jean Belille, Abigail Dean, Annette Maxwell, Alex North, and David Golden).

Suzanne

Suzanne J. Bohan

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